



February 26, 2007

Ms. Amy M. Bennett
Standards Coordinator
Bureau of Water
S.C. Department of Health and Environmental Control
2600 Bull Street
Columbia, S.C. 29201

RE: Comments of Progress Energy Carolinas, Inc. on
Notice of Drafting Regarding Amendments to R.61.68, Water
Classifications and Standards and R. 61.69, Classified Waters
South Carolina State Register, Volume 31, Issue 1, (January 26, 2007)

Dear Ms. Bennett:

Progress Energy Carolinas, Inc. (PEC), a subsidiary of Progress Energy, provides electricity and related services to more than 164,000 customers in South Carolina. Our service territory covers more than 4,500 square miles in northeastern South Carolina and includes the major cities of Florence and Sumter. PEC also owns and operates two power plant sites in South Carolina with a total generating capacity of more than 1700 MWe. Accordingly, it is likely that PEC's activities related to the generation, transmission, and distribution of electricity may be affected by any changes to South Carolina's water classifications and standards. Below are recommendations which are being submitted on behalf of PEC.

The water quality numeric criteria for the protection of aquatic life for copper should be modified using a new scientific model, the biotic ligand model (BLM), as recommended in EPA's Aquatic Life Ambient Freshwater Quality Criteria—Copper 2007 Revision (EPA-22-R-07-001).

The water quality criteria for the protection of aquatic life for copper as currently specified in R.61.68, Water Classifications and Standards appear to be based on the "California Toxics Rule" which was published in 2000. It is our understanding that the current criteria are based on an empirical relationship between relative toxicity and water hardness. PEC understands that the BLM is dependent on a number of water quality parameters (e.g. dissolved organic carbon, calcium, etc.) and believes the BLM will yield standards more relevant and appropriate for the protection of the state's aquatic life.

PEC appreciates this early opportunity to comment on the triennial review and look forward to working with your agency in the future. If you have questions concerning our comments, please contact me at (919) 546-3775 or Mick Greeson at (919) 546-5438.

Sincerely,

A handwritten signature in black ink, appearing to read 'Caroline Choi', with a long, sweeping horizontal line extending to the right.

Caroline Choi

Director

Energy Policy and Strategy